

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**WILLIAM STANFORD, JR., Individually and on
Behalf of All Other Similarly Situated Persons
and on Behalf of the Foamex L.P. Savings Plan,**

Plaintiff,

v.

**FOAMEX L.P., FIDELITY MANAGEMENT
TRUST CO., K. DOUGLAS RALPH, STEPHEN
DRAP, GREGORY J. CHRISTIAN, and
GEORGE L. KARPINSKI,**

Defendants.

No. 07-CV-04225

William H. Yohn, Jr.

**PLAINTIFF STANFORD'S MOTION FOR
(1) PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT,
(2) AUTHORIZATION OF NOTICE TO CLASS, AND
(3) SCHEDULING OF FINAL SETTLEMENT APPROVAL HEARING**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff William Stanford, on his own behalf and on behalf of the class he represents, moves for an Order which (1) preliminarily approves the proposed Settlement Agreement and Allocation Plan, (2) authorizes the mailing of notice of a proposed settlement to class members and (3) schedules a final settlement approval hearing.

This motion is supported by a memorandum in support and Declaration of Richard E. Spoonemore.

DATED: March 12, 2012.

SIRIANNI YOUTZ
SPOONEMORE

BY: /s/ Richard E. Spoonemore
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Counsel for Plaintiff William Stanford, Jr.

CERTIFICATE OF SERVICE

I certify, under penalty of perjury, that on March 12, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that a true and correct copy of the foregoing was served upon the following by ECF:

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DATED: March 12, 2012.

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